

I. Independent claims 1, 19 and 33:

1) Applicants respectfully disagree with the assertion of the Examiner that independent claims 1, 19 and 33 have been anticipated by Radziewicz (US Patent No. 5,854,897) under 35USC §102(e). Radziewicz has already been removed as prior art by declaration filed March 12, 2001. The Examiner has already agreed that said declaration is sufficient to overcome Radziewicz (see action of June 4th, 2001.) Accordingly, the present rejection should be withdrawn.

During a telephone call on March 17th, the Examiner indicated that applicants can not swear behind Radziewicz because Radziewicz includes means plus function claims, and the means plus function limitation includes the embodiment in the specification. Hence, the Examiner stated that the claims in Radziewicz include language covering the present invention.

Applicants respectfully assert that the Examiner's analysis is incorrect. The claims in Radziewicz are not directed to the same invention as the claims of the present application. Many limitations of the present claims are not in Radziewicz, and many limitations of Radziewicz' claims are not in the present invention. Thus, Radziewicz and the present application do not claim the same invention, and the office action does not even allege otherwise.

Applicants fully agree that they can not swear behind a reference that claims the same thing they are claiming, as such a fact pattern would require an interference to be initiated. However, that is not what applicants are attempting to do in the present situation. The Examiner has never asserted, nor do applicants believe, that Radziewicz and the present invention are claiming the same thing. The Examiner has merely asserted that a teaching of Radziewicz happens to be in the claim, along with many other limitations. This does not mean an interference is required, and there is not reason applicants can not swear behind Radziewicz.

2) Applicants respectfully disagree with the assertion of the Examiner that independent claims 1, 19 and 33 are obvious over a combination of Herz (US Patent No. 5,754,938) and Vance (US Patent No. 5,822,539) under 35USC §103(a).

In particular, Applicants do not believe that the patentably distinguishing feature “the additional content is determined by the identifier of the targeted network server”, which is not disclosed by Hertz as noted by the Examiner, can be concluded from the combination of Vance with Hertz. More specifically, Vance teaches to use extensions to the URL scheme as the address of the information resources of the proprietary online services so that the single client application can get access to the information resources in the same way as it gets from regular non-proprietary web servers addressed in the URL scheme. Contrary to the assertion of the Examiner, Vance teaches nothing about using an identifier (URL) of a targeted server to determine the additional content (information resources) of another server (the proprietary online services, read as “bridge server”). Moreover, no motivation as asserted by the Examiner can be found in either Hertz or Vance to combine them to construct the present invention as defined in claims 1, 19 and 33. Therefore, Applicants respectfully submit that claims 1, 19 and 33 are not obvious over the combination of Hertz and Vance under 35USC §103(a).

3) None of other cited patents Hudetz (US Patent No. 5,978,773), Rondeau (US Patent No. 5,850,433), Gabber (US Patent No. 5,961,593) and Van Hoff (US Patent No. 5,822,539) discloses the above underlined distinguishing feature that “the additional content is determined by the identifier of the targeted network server”. Therefore, independent claims 1, 19 and 33 are believed patentable.

II. Independent claims 24 and 29:

1) Applicants respectfully disagree with the assertion of the Examiner that independent claims 24 and 29 are anticipated by Radziewicz (US Patent No. 5,854,897) under 35USC §102(e). As discussed above, Radziewicz has already been removed as prior art by declaration filed March 12, 2001. The Examiner has already agreed that said declaration is sufficient to overcome Radziewicz (see action of June 4th, 2001.) Accordingly, the present rejection should be withdrawn.

2) Applicants respectfully disagree with the assertion of the Examiner that claims 24 and 29 have been anticipated by Hudetz (US Patent No. 5,978,773) under 35USC §102(e).

Hudetz discloses a system to use a barcode ("UPC") to retrieve associated URL of a targeted website from a database maintained by a service provider, and then use the URL to submit a request to visit the targeted website. Hudetz, however, does not teach that the request for the content of the targeted website ("network server") is marked up by the service provider ("bridge server") and returned to the user for re-submission. More specifically, there are two requests involved in Hudetz. The submission of the UPC to the service provider is a first request for the address of the targeted website, while using the records (or hypertext links) retrieved from the service provider to visit the targeted website is a second request for the content of the targeted website. Obviously, the returned records are not a marked-up version of the first request, but a result of the first request. Moreover, the returned records are used as the second request for the content of the targeted website, and thus not the marked-up version of the second request, either. Therefore, Claims 24 and 29 are not anticipated by Hudetz under 35USC 102(e).

3) None of the other cited patents Rondeau (US Patent No. 5,850,433), Gabber (US Patent No. 5,961,593), Herz (US Patent No. 5,754,938), Vance (US Patent No. 5,822,539) and Van Hoff (US Patent No. 5,822,539) has disclosed the invention as defined in independent claims 24 and 29 too. Therefore, independent claims 24 and 29 are believed patentable.

III. Dependent claims 2-4, 6-9, 11, 13-18, 21-23, 25, 30, 34-39 and 42-43:

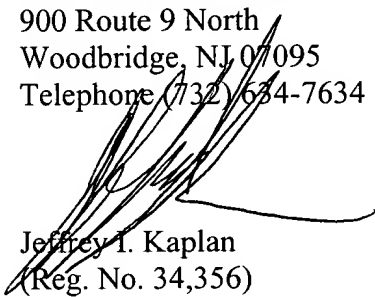
At least for the above reasons as to the patentability of independent claims 1, 19, 33 and 24, 29, all the dependent claims are also believed patentable as each of them includes all the limitations of one of the five independent claims.

Therefore, Applicants respectfully request reconsideration and allowance of claims in view of the above remarks. The Examiner is authorized to deduct any fees believed due from our Deposit Account No. 11-0223.

Respectfully submitted,

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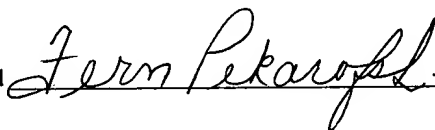

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Dated March 17, 2004

Signed



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